

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE

UNITED STATES OF AMERICA,)	
)	
v.)	No. 3:20-CR-97
)	
JASON T. NICHOLS,)	
)	
Defendant.)	

MOTION TO CONTINUE PLEA DEADLINE

Comes now the defendant, Jason Nichols, by and through counsel, and would move this Honorable Court to continue the plea deadline previously set by this Court for October 12, 2021. For grounds, counsel would show that that since the date of the initial indictment in this case he has been in communication with the Assistant United States Attorney regarding a potential plea deal. Counsel has been of the understanding that a plea offer would be forthcoming, but as of the date of this filing, no plea offer has been received – although counsel believes that such an offer will be made in the near future. Movant Nichols would request that the Court either set a new plea deadline or suspend any deadline to allow a plea to be entered at any time prior to the scheduled trial date of November 9, 2021 to allow the parties to finalize plea discussions.

WHEREFORE, Defendant would move the Court to enter an Order continuing the plea deadline currently set for October 12, 2021 to a date agreeable to the parties and to the Court, the interests of justice so requiring.

Respectfully submitted this 7th day of October, 2021.

/s/ Christopher Oldham
Christopher J. Oldham (BPR# 016239)
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CERTIFICATE OF SERVICE

I, hereby certify that on the 7th day of October, 2021, a copy of the foregoing was filed electronically or that this document was hand delivered to the other parties. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U. S. Mail. Parties may access this filing through the Court's electronic filing system.

By: /s/Christopher Oldham